#### **BEFORE THE**

### **ILLINOIS COMMERCE COMMISSION**

VERIZON NORTH INC.,	)
VERIZON SOUTH INC.	)
AND GRANITE TELECOMMUNICATIONS, LLC	)
	)Docket No
Joint Petition Regarding the Adoption	)
of an Interconnection Agreement	)

# JOINT PETITION OF VERIZON NORTH INC., VERIZON SOUTH INC. AND GRANITE TELECOMMUNICATIONS, LLC REGARDING THE ADOPTION OF AN INTERCONNECTION AGREEMENT

Verizon North Inc., Verizon South Inc. (collectively "Verizon"), and Granite

Telecommunications, LLC ("Granite"), Joint Petitioners, pursuant to 47 U.S.C. §252(i), submit
this Joint Petition to the Illinois Commerce Commission for its review regarding the adoption of
an interconnection agreement between Verizon and Granite, on the following grounds:

- 1. Verizon North Inc. and Verizon South Inc. are telecommunications carriers within the meaning of Section 13-202 of the Universal Telephone Protection Act of 1985, 220 ILCS 5/13-100, et seq. and each is authorized to provide and is currently providing, intraMSA exchange and interexchange telecommunications services to customers within certain certificated areas of the State of Illinois.
- 2. Granite represents that it is a certified provider of telecommunication service in Illinois and that this adoption will cover services only in the State of Illinois.
- 3. Pursuant to Section 252(i) of the Telecommunications Act of 1996 ("Federal Act"), Granite notified Verizon that it desired to adopt the terms of the interconnection

Joint Petition – IL

agreement (the "Agreement") between Camarato Distributing, Inc. and Verizon approved by the Illinois Commerce Commission as an effective agreement in the State of Illinois. A copy of this agreement is attached as <u>Exhibit 1</u>. Subsequently, Verizon and Granite signed letters relating to Granite's adoption of the terms of the Agreement. A copy of this letter is attached as <u>Exhibit 2</u>.

- 4. The Illinois Commerce Commission approved the Agreement pursuant to Communications Act of 1934, as amended. Accordingly, pursuant to Section 252(i) of the Federal Act, Granite has the right to adopt the Agreement's terms.
- 5. Subject to the reservation of rights detailed in Exhibit 2, there are no outstanding issues between Verizon and Granite relating to this adoption. Verizon is submitting this petition pursuant to Section 252(i) of the Federal Act to notify this Commission of the adoption described herein. Section 252(i) of the Federal Act provides:

### (i) Availability to other telecommunications carriers:

A local exchange carrier shall make available any interconnection, service, or network element provided under an agreement approved under this section to which it is a party to any other requesting telecommunications carrier upon the same terms and conditions as those provided in the agreement.

The Commission approved the Agreement pursuant to Section 252(e) of the Federal Act.

Accordingly, per Section 252(i) of the Federal Act, Granite has the right to adopt the

Agreement's terms.<sup>1</sup>

Joint Petition – IL 2

<sup>&</sup>lt;sup>1</sup> Verizon is submitting this petition pursuant to Section 252(i) of the Telecommunications Act of 1996 to notify the Commission of the adoption described herein. With respect to the prior applications of this nature, the Commission has elected to treat the adopted terms as a negotiated agreement. Because Section 252(i) requires the adoption to be implemented as a matter of law, Verizon does not agree with the Commission's characterization of these adoptions as negotiated agreements. Nonetheless, Verizon shall abide by the adopted terms in accordance with, and subject to, the adoption letter executed by Verizon that is being submitted with this application as Exhibit 2.

6. As stated in the Statement in Support of an Adoption of an Interconnection

Agreement, Verizon will continue to make the arrangements set forth in the Agreement available on the same terms and conditions to any duly authorized telecommunications carrier operating within the State of Illinois to the extent required and permitted under Section 252(i) of the Federal Act. Therefore, this filing is not discriminatory.

Joint Petition—IL 3

## THEREFORE, Verizon and Granite respectfully submit this Adoption of an

Interconnection Agreement on this	day of, 2004.
VERIZON NORTH INC. VERIZON SOUTH INC.	GRANITE TELECOMMUNICATIONS, LLC
By:	By:
John E. Rooney Sarah A. Naumer	Geoff Cookman 234 Copeland Street
Sonnenschein, Nath & Rosenthal LLP 233 S. Wacker Drive 8000 Sears Tower	Quincy, MA 02169 866-847-1500 x521 gcookman@granitenet.com
Chicago, Illinois 60606 (312) 876-8000 jrooney@sonnenschein.com	

Joint Petition—IL 4

snaumer@sonnenschein.com